



**Department of Energy
Oak Ridge Operations
Office of Environmental Management
Procedure**




GUIDANCE FOR FACILITY REPRESENTATIVE OVERSIGHT OF LESSEES AT ETTP

**EM – 3.6
Revision 0**

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LIST OF ACRONYMS

AMNFS	Assistant Manager of Nuclear Fuel Supply
CROET	Community Reuse Organization of East Tennessee
DOE	Department of Energy
DTSAD	Director Technical Support and Assessment Division
EM	Office of Environmental Management
ETTP	East Tennessee Technology Park
FR	Facility Representative
FRTL	Facility Representative Team Leader
ORO	Oak Ridge Office
POI	Protocol of Interface
QA	Quality Assurance
SME	Subject Matter Expert
TQP	Training and Qualification Program
USEC	United States Enrichment Corporation

1.0 PURPOSE

The purpose of this procedure is to identify the scope and to specify the roles and responsibilities of the Facility Representative (FR), who has been assigned to provide oversight of Lessee activities that could impact the industrial and environmental safety of co-located workers, the public, Department of Energy (DOE) properties, and the environment.

2.0 SCOPE

This procedure shall provide guidance to the FR responsible for providing oversight support and will encompass those Lessees that either lease or sublease a facility from the DOE-Oak Ridge Office (ORO), or the Community Reuse Organization of East Tennessee (CROET) at East Tennessee Technology Park (ETTP), excluding the lease with the United States Enrichment Corporation (USEC). Specifically, this procedure will provide direction for observing activities, evaluating results, reporting or responding to DOE management or the Lessees, and verifying the effectiveness of the oversight program. In addition, it will identify how to communicate information to the Lessee including the planned activities of the DOE-ORO, Office of Environmental Management (EM). It will also identify the training and qualification requirements of personnel, as well as those documents that will be used as a basis for determining sound industrial and environmental safety practices, when reporting to DOE Management and the Lessees.

3.0 REFERENCES AND DEFINITIONS

3.1 References

- 3.1.1 The following list of references are to be used as a guide for determining the safety of the Lessees operations/activities, unless they are specifically identified in any current binding contract, lease, or lawful (federal, state, or municipal) regulation, permit, authorization, and/or agreement.

- 3.1.1.1 DOE STD 1063-2000, *Facility Representatives*
- 3.1.1.2 Lessee Documents and Contracts
- 3.1.1.3 Protocol of Interface (POI)
- 3.1.1.4 Lessee Oversight Program Description

3.2 Definitions

- 3.2.1 Facility Representative: An individual assigned responsibility by the Assistant Manager for Environmental Management for monitoring the safety performance of certain facilities and its operations. This individual is the primary point of contact with the Lessee for operational and safety oversight and is responsible to the Facility Representatives Team Leader.

4.0 ROLES AND RESPONSIBILITIES

4.1 Assistant Manager for Nuclear Fuel Supply (AMNFS):

- 4.1.1 Identify the leased facilities/companies that should have a FR assigned to them for the purpose of oversight.
- 4.1.2 Establish a Protocol of Interface (POI) that defines the interactions between CROET, the Lessee, and the FR.
- 4.1.3 Ensure findings identified by the FR are transmitted to the Lessee.
- 4.1.4 Ensure that either CROET or the Lessee respond in a timely manner to deficiencies.
- 4.1.5 Ensure the FR is granted unencumbered access to those facilities deemed to require FR oversight. This includes site access, the opportunity to attend meetings, training classes, planning sessions, pre-job briefings, observation of activities, and access to any documents that describe Lessee activities and technical requirements for operation.

4.2 Community Reuse Organization of East Tennessee (CROET):

- 4.2.1 Agree and ensure compliance by the Lessees with the POI that defines the interactions between CROET, the Lessee, and the FR.

4.3 EM Director Technical Support and Assessment Division (DTSAD), and FR Team Leader (FRTL):

- 4.3.1 Assign qualified FRs to maintain oversight coverage of applicable facilities/projects.
- 4.3.2 Select and train FRs so that he/she is capable of performing his/her assigned duties.
- 4.3.3 Periodically evaluate the effectiveness of the FR and pursue changes to improve overall performance and effectiveness.
- 4.3.4 Serve as Liaison between the FR, AMNFS, and ETTP Project Director for any dispute resolution.

4.4 Facility Representatives (FR):

- 4.4.1 Maintain dynamic coverage of assigned Lessee operations/activities. This includes spending a significant portion of time in the field observing these operations/activities.
- 4.4.2 Maintain frequent communications between Lessee, AMNFS, and ETTP Project Director.
- 4.4.3 Obtain and maintain a familiarization with Lessee site and facility characteristics, operating procedures, operating organizational structure, and key contact personnel.
- 4.4.4 Report potential or existing findings to the AMNFS and maintain a record of completed reports.
- 4.4.5 Know and adhere to established codes of conduct and protocols while performing assigned duties.
- 4.4.6 Vary his/her presence to show a degree of unpredictability and spontaneity based on his/her judgment regarding what is appropriate to assess.
- 4.4.7 Request Subject Matter Expert (SME) support during walkthroughs as necessary.

4.4.8 Participate in the annual ETP Safety Council Meetings.

5.0 PROCEDURE

5.1 Procedure

5.1.1 This procedure shall be used as guidance for overseeing Lessee performance to current industrial and environmental safety standards and requirements to ensure they are being used. The objective is to maintain the best possible industrial and environmental safety posture for personnel (facility workers, co-located workers, public, and environment) and property belonging to the Lessee, CROET, and DOE-ORO while minimizing impacts to Lessee productivity.

5.1.1.1 The FR will not be assigned to perform oversight activities on any dedicated schedule but instead will perform oversight activities in an unencumbered and unpredictable manner as described in DOE STD 1063-2000, "Facility Representatives."

5.1.2 The FR should:

5.1.2.1 **Observe** periodically Lessee operations/activities including but not limited to work planning, operations/activities, and training sessions.

5.1.2.1.1 Observe facility activities that impact industrial and environmental safety to ensure the Lessee is operating the facility in a safe and compliant manner as prescribed by contract, lease, or lawful (federal, state, or municipal) regulation, permit, authorization, and/or agreement.

5.1.2.1.2 Determine if the Lessee's management system is effectively controlling operations and maintenance activities to ensure a safe working environment.

5.1.2.2 **Evaluate** Lessee compliance with established regulations and contract requirements.

5.1.2.2.1 Evaluate applicable requirements and agreements provided by the AMNFS and evaluate Lessee performance against these requirements and agreements.

5.1.2.3 **Report** the findings derived from oversight activities.

5.1.2.3.1 Upon completing the initial walkdown(s) of the Lessee facilities, write a report (Attachment "A") communicating the scope of the Lessee operation, requirements documents driving the operation, any perceived findings, along with any recommendations for correcting those findings.

5.1.2.3.2 Communicate the results of the initial walkdowns to the AMNFS and FRTL.

5.1.2.3.3 Perform periodic walkdowns of the facility and follow the POI that defines the interactions between CROET, Lessees, and the FR when communicating the results of the walkdowns.

5.1.2.3 **Verify** the effectiveness of Lessee oversight periodically.

5.1.2.3.1 Periodically review the Lessee implementation of suggested corrective actions and report the results to management.

5.2 Training Requirements

5.2.1 Each FR by a combination of education, experience, and training should be qualified to carry out the duties and responsibilities identified in this procedure.

5.2.1.1 Education requirements should match those required by the current FR Training and Qualification Program (TQP).

5.2.1.2 Experience requirements should match those required by the current FR TQP.

5.2.1.3 Training requirements should match those required by the current FR TQP.

5.2.1.4 Project specific training requirements for the Lessee should be commensurate with the hazards, activity, and complexity of the operations performed. This shall be documented in a report directed to the FRTL based on the initial walkdown(s) performed by the FR to determine the operational scope and requirements, and understand the hazards, activities, and complexity of the operations performed by the Lessee.

5.2.1.5 Upon reviewing the report the FRTL with input from the DTSAD, and other applicable personnel will determine if any additional training is required above and beyond that already maintained by the FR.

5.3 Completing the Attached Form

5.3.1 Attachment "A" Lessee Operations Walkthrough Report can be located on EM computer servers "N" drive at N:\AMEM\Technical Documents\EM-3.6 Report Form. The form is in Microsoft Word format and can be filled out by following these simple instructions.

5.3.1.1 Save the form from the EM computer servers "N" drive to your desktop then open the form.

5.3.1.2 Fill in the top section of the form filling in the blanks next to the titles provided.

5.3.1.3 Section 1 is set-up to automatically number itself for additional activities, findings, or observations by placing the cursor next to the item number or letter then selecting the "Table" menu and scrolling down to the insert option and then selecting the row above or below option depending on where you want the next row.

5.3.1.4 If you want rows added without a number beside then perform the action above and then highlight the cell with the number or letter in it. Then go to the tool bar above and select and click the icon that has numbered lines in it. This will turn off the auto-numbering feature for this cell and give you just a line to type on. If you require additional unnumbered lines then follow the directions above in step 5.3.1.3 once again to add a row.

5.3.1.5 Section 1 can be manipulated in this manner for as many findings or observations you have for a topic that has been reviewed.

5.3.1.6 To add another complete set of rows for another activity (findings and observations) highlight all of the rows underneath the Section 1 Title and copy them. Then paste them directly underneath the first table. The Work Activity Observed number will automatically advance to two.

- 5.3.1.7 Each additional line needed for findings and observations for this new activity should be performed using the instructions in steps 5.3.1.3 and 5.3.1.4.

6.0 RECORDS

6.1 Program Records

- 6.1.1 Policies and procedures are considered Quality Assurance (QA) documents/records. Current policies and procedures as well as supporting documentation shall be maintained in accordance with the prevailing QA program.
- 6.1.1.1 A copy of complete reports (Attachment "A") shall be kept and maintained by the individual FR generating them.

7.0 ATTACHMENTS

- Attachment "A" *Lessee Operations Walkthrough Report* *
 - * A blank working copy of this form can be found on the EM computer servers "N" drive at N:\AMEM\Technical Documents\EM-3.6 Report Form.

ATTACHMENT "A"

LESSEE OPERATIONS WALKTHROUGH REPORT

U.S. Department of Energy

Page ____ of ____

Date Performed: _____ Functional Area: _____

Site/Plant: _____ Work Location/Facility: _____

Company Name: _____

Section 1 (Repeat the following section as needed for each Activity and/or Finding)

Work/Activity(s) Observed:

1. _____

Findings:

a. _____

Requirement Reference: _____ ISM Function Code: _____

Follow-up Required: Yes _____ No _____

Observations: (proficiencies or best management practice deficiencies)

i. _____

ISM Function Code: _____ Follow-up Required: Yes _____ No _____

Comments:

Section 2

Findings/Observations Discussed With (Escort Name, Supervisor, Shift Manager etc...):

Reviewer Name: _____

Reviewer Telephone Number: _____

ISM Function Codes:

1. Define the scope of work 2. Analyze the hazards 3. Develop and implement hazard controls
4. Perform work within controls. 5. Provide feedback and continuous improvement